



# SUNCORP GROUP PRIVACY POLICY

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## About Suncorp

Suncorp is the name we use to describe the group of companies that is owned by Suncorp Group Limited. Suncorp's group of companies offer a range of financial products and services in general insurance, health insurance and life insurance, in Australia. The companies in our corporate group collect, hold, use and disclose your personal information in a number of different ways. To find a list of our brands / companies, please click [here](#).

We are committed to ensuring that your personal information is protected.

For details of the New Zealand privacy regime please refer to the [Vero Insurance New Zealand Limited Privacy Statement](#), and the [Vero Liability Insurance Limited Privacy Policy](#).

## Our Privacy Policy

Our Privacy Policy provides you with general information about how the brands / companies in Suncorp manage your personal information as required by relevant Privacy laws. When you purchase or acquire a product or service from us you will receive further information about our privacy practices in a privacy statement or other form of privacy disclosure ("**Privacy Statement**"). The Privacy Statement will give you specific information about how we will manage the personal information for the particular product or service and/or the particular company/brand.

Depending on how you interact with us, a Privacy Statement may be delivered to you in a number of ways, including hard copy/paper or via electronic means.

We also have *Online Terms & Conditions* which detail your use of our websites and other online interactions. Please refer to those terms at the bottom of each company website prior to using the services our websites offer, or when you are directed to do so, such as during the acquisition of a product or service.

## The types of Personal Information we collect and hold

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes sensitive information. We will ask for a broad range of personal information which is necessary for our functions or activities. The type of personal information we ask for will depend on which of the companies / brands in Suncorp you do business with and the type of product or service you choose.

We will generally ask for the following types of personal information:

- name, address and contact details;
- date of birth;
- gender; and/or

- information about your use of our product or service.

Depending on the product or service you choose, we may also collect other types of personal information such as:

- insurance/financial/credit/bankruptcy history;
- bank account details for payments by direct deposit;
- employment information;
- marital status/family details or circumstance;
- pastime information;
- tax file number;
- details about the risk you want to insure (e.g., home, contents, holiday, car, business); and/or
- any other personal information which is either required to acquire a product or service or needed during the lifecycle of that product or service.

We may also collect sensitive information such as information or opinion about your:

- health;
- racial or ethnic origin;
- sexual preferences or practices;
- membership of a political, professional or trade association (or union);
- religious beliefs or affiliations; and/or
- criminal history.

## How we collect your Personal Information

We collect your personal information:

- directly from you;
  - by using written forms;
  - through contact over the telephone, mobile or other messaging technology;
  - via the internet, including websites and social media; and/or
  - in person-to-person contact (e.g., meetings or providing products and services through our offices, at brand marketing and awareness events or service centres including temporary locations to support a disaster response.
- from publicly available sources of information; and/or
- from other persons or organisations (including related and third parties).

We will collect your personal information during the information life cycle, on an ad hoc or a recurrent basis using the above methods. For example, we will collect personal information when you acquire a product or service from us, when you make changes to that product, when you make a claim or exercise a right under the product or service or

when you need to complain. We will combine or link personal information we already know about you to other personal information we collect about you.

Please refer to “*Who do we share your Personal Information with?*” section which details the types of organisations we disclose your personal information to and collect your personal information from.

## Why we collect your Personal Information

We collect your personal information so we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a product or service;
- set up, administer, and manage our products and services, including the management and administration of underwriting and claims;
- use, hold and disclose your information to service, maintain and administer customer accounts, insurance policies and claims (for example, the updating of customer contact information);
- assess and investigate a claim made by you under one or more of our products;
- manage, train and develop our employees and representatives;
- manage complaints and disputes, and report to dispute resolution bodies; and
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy including managing the delivery of our services and products via the ways we communicate with you.

Sometimes we are required to collect your personal information to satisfy specific legal obligations. The Privacy Statement you receive will give you further details as to which laws may apply to your personal information.

Your Privacy Statement may also contain different primary purposes of collection depending on the product or service you buy from us, your interaction with us, or the company or brand in Suncorp that you do business with.

## How we use and disclose your Personal Information

We use and disclose your personal information for the purposes we collected it. Please refer to “*Why we collect your Personal Information*” section to understand what these purposes may be.

We will use and disclose your personal information for a secondary purpose related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose. In the case of sensitive information, any secondary use or disclosure will be directly related to the purpose of collection. For example, we will disclose your personal information to third party service providers so that they can provide the contracted services to Suncorp’s group of companies such as information technology support or programming, hosting services, telephony services, mailing or sending of documentation to customers digitally or otherwise.

There will be other instances when we may use and disclose your personal information including where:

- you have expressly or impliedly consented to the use or disclosure;
- we reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body; or
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena, or to the Australian Taxation Office, Centrelink, and the Australian Transaction Reports and Analysis Centre (AUSTRAC).

## Sharing Personal Information between Suncorp companies

We may share your personal information with all companies that form a part of Suncorp. If one Suncorp company collects your personal information, other Suncorp companies may use and disclose your personal information for the purposes described in the “*Why we collect your Personal Information*” section in relation to any products and services they may provide to you. Other companies in Suncorp may also use your personal information for the purposes of providing products and services to other customers (but we will not disclose your personal information to any other customer without your consent).

## Marketing

Marketing is an important part of our business. We want to collect, use, and disclose your personal information to keep you up to date with the range of products and services available from Suncorp and which we think may be of interest to you. We use a wide variety of marketing strategies including mail, SMS, telephone, and other internet-based marketing including targeted online advertising and online behavioural marketing. Third party marketing service providers may combine the personal information we disclose to them with information they already hold about you, in order to serve you with more relevant advertising about our products and services.

Refer to your relevant Privacy Statement or privacy disclosure as to how our companies will deal with your personal information for the purpose of marketing. We want you to be able to exercise your marketing preferences. Details of how to exercise your preferences will be detailed in those statements and via our marketing communications to customers and non-customers.

## Sharing Personal Information to overseas locations

We will send your personal information overseas and collect personal information from overseas. Instances when we will do this include:

- when you have asked us to do so, or we have your consent;
- when we are authorised or required by law or a court/tribunal to do so;
- when we have outsourced a business activity or function to an overseas service provider; and
- certain electronic transactions.

Your personal information may be transferred to other countries, which may not have similar privacy or data protection laws, and may in certain circumstances compel the disclosure of personal information to a third party such as an overseas authority for the purpose of complying with foreign law or regulatory requirements.

We will disclose personal information overseas but only to the extent it is necessary to perform our functions or activities. In order to engage in our business activities and functions we will disclose your personal information to and collect your personal information from people and organisations (**'parties'**) in a number of countries. Please click [here](#) to see a list of countries in which those parties are likely to be located. From time to time, we will need to disclose your personal information to and collect your personal information from other countries not on this list. This will be on an ad hoc or case-by-case basis and for the purposes for which we collected your personal information.

## Who do we share your Personal Information with?

As detailed in the *"How we collect your Personal Information"* section there are a range of parties to whom we disclose your personal information and collect personal information from – that are not you. These may be parties related to Suncorp or third parties. The particular party will depend on which company or brand in Suncorp you do business with and what product or service you receive. Some examples of the parties to whom we may disclose your personal information to and collect personal information from are:

- other companies within Suncorp and other trading divisions or departments within the same company (to see a list of our brands/companies, please click [here](#));
- former Suncorp companies while within Suncorp's technology infrastructure;
- any of Suncorp's joint ventures where authorised or required;
- customer, product, business or strategic research and development organisations;
- a third party with whom we have contracted to provide financial services/product, administrative or other business services – for example:
  - information technology providers,
  - administration or business management services, consultancy firms, auditors and business management consultants;
  - marketing agencies and other marketing service providers;
  - claims management service providers;
  - print/mail/digital service providers; and
  - imaging and document management services
- data warehouses, strategic learning organisations, data partners, analytic consultants;
- social media and other virtual communities and networks where people create, share or exchange information;
- publicly available sources of information;
- clubs, associations, member loyalty or rewards program providers and other industry relevant organisations;
- any intermediaries, including your agent, adviser, a broker, a representative or person acting on your behalf, other Australian Financial Services Licensees or our authorised representatives, advisers and our agents;

- a third party claimant or witnesses in a claim;
- accounting or finance professionals and advisers;
- an employer, trustee or custodian associated with membership of a life insurance policy;
- government, statutory or regulatory bodies and enforcement bodies;
- policy or product holders or others who are authorised or noted on the policy as having a legal interest, including where you are an insured person but not the policy or product holder;
- in the case of a relationship with a corporate partner such as a bank or a credit union, the corporate partner and any new incoming insurer;
- the Australian Financial Complaints Authority or any other external dispute resolution body;
- other insurers, insurance investigators and claims or insurance reference services, loss assessors;
- legal and any other professional advisers or consultants;
- hospitals, medical/ health, or wellbeing professionals;
- debt collection agencies; and
- any other organisation or person where you have asked them to provide your personal information to us or asked us to obtain personal information from them, (e.g., your partner, spouse, parent or guardian).

## How do we secure and protect your Personal Information?

We hold your personal information in:

- computer systems;
- electronic databases;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

These storage mechanisms may be managed in a number of ways. They may be managed or administered internally by a company in Suncorp, or they could be managed by a third party storage provider with whom Suncorp has a contractual relationship and be either managed locally and/or overseas.

We will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;

- requiring any third-party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information pursuant to the law and our record retention policies.

We maintain industry standard technology and procedures in respect of our information management and provision of online services. Suncorp has an ongoing program of review and enhancement of its security measures. The reviews and updates address such matters as security and information management policies, processes and procedures, and technology reviews such as software, virus protection and fire wall settings. Suncorp's systems and information technology infrastructure are regularly audited both by internal and external experts and regulatory bodies as required.

E-mail transmissions to and from Suncorp are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the internet, then you should consider contacting us by other means. Suncorp employs strong encryption techniques and the use of firewalls similar to other financial institutions and internet transaction systems globally. If you make a transaction involving the submission of personal information over the internet to Suncorp using one of our online forms, then Suncorp employs encryption technology. Once Suncorp has received your personal information, it is stored and protected by a range of security controls, including firewalls, user identification requirements and audit trails.

Suncorp trains its employees and representatives in their privacy obligations, applies confidentiality obligations and provides authorised persons with user identifiers, passwords or other access codes to control access to your personal information.

## Cookies

Our websites rely on "cookies" to provide a number of services to you. A cookie is a small text file placed on your computer by our web server. A cookie can later be retrieved by our website servers. Cookies are frequently used on websites, and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. Cookies do not alter the operation of your computer or mobile device in any way.

Cookies generally allow our websites you are browsing to interact more efficiently with your device. Suncorp's group of companies uses cookies to collect and use information for a range of purposes, including: to maintain and improve the operation of our websites; track user preferences and product requirements to customise our websites and target and improve advertising relevance. We may also have an arrangement with third parties who may use our cookies to improve the relevance of our advertising to you on third party websites. Please see our *Online Terms & Conditions* found on our websites for more information. You can also refer to our [Cookie & Data Policy](#) found on the Suncorp Website.

## What if you're not a Suncorp customer?

You may not be a customer of ours, but you may interact with one of our companies. You could be a claimant under our insured's policy, a witness in an accident or a spouse or family member of a customer. You may also interact with one of our companies by using our transactional websites, entering a competition or commenting via social media.

We will collect, use and disclose your personal information in accordance with this Privacy Policy and any Privacy Statement you may receive when you interact with us. Please see our *Online Terms & Conditions* found on all our transactional websites for more information about interacting with us via the Internet.

## What if you don't provide us with your Personal Information?

You do not have to provide us with personal information when seeking our products or services or interacting with us. However, if we are not able to collect certain personal information about you, we may not be able to provide you with the products, services or assistance you require.

Australian privacy law gives you the option of not identifying yourself, or of using a pseudonym unless we are required or authorised by law or a court/tribunal to identify you, or it is impracticable to deal with you anonymously or by a pseudonym. There are some limited cases where you can deal with us anonymously, such as if you are only looking for general information about one of our products or services.

## Accessing or correcting your Personal Information

We rely on the accuracy of the personal information we hold about you to provide our products and services to you. You have the right to request access to or correction of the personal information we hold about you, including any inaccurate, out-of-date, incomplete, irrelevant, or misleading personal information.

If you would like to request access to or correct the personal information we hold about you please contact us by using the relevant Access or Correction contact in Suncorp's Group Privacy Contact Information table, which can be found [here](#) as we may be able to provide this information within our normal business processes. If we cannot, we will be able to commence the privacy access request process for you which may require you to complete a privacy access request form. There is no charge for requesting access to or correction of your personal information, but we may charge you a reasonable amount to cover matters such as retrieving, copying and sending out information.

We will respond to your requests to access or correct your personal information in a reasonable time. This is usually within 5 business days. Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time, we will contact you in writing to advise you of this and to provide our reasons for the further time that is required.

Privacy Laws provide for some circumstances in which we are not required to give you access to your personal information and sometimes we may not agree that the personal information that we hold about you needs correcting. In these situations, we'll write to let you know why. You can ask that we include a statement with your personal information that says that you believe it's inaccurate, out of date or incomplete









# What if you have a privacy complaint?

If you have a complaint about how we have handled your personal information, an alleged breach of privacy or another privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help.

The simplest way to raise an issue related to your privacy is by contacting us. First, we'll acknowledge your complaint and explain how we'll work with you to resolve it, at this point we may refer your complaint directly to our Customer Relations Team. Whilst we're usually able to resolve complaints on the spot or within 5 business days, we'll let you know if we need more time. we will keep you informed of the progress and provide you with an outcome within 30 calendar days from when we first received your complaint. You can contact us by using the relevant Complaints contact in Suncorp's Privacy Contact Information table which can be found [here](#).

If we can't resolve your complaint quickly or you'd prefer not to contact the people who provided your initial service or you are not happy with our response to you, you can ask for your complaint to be sent to our Customer Relations team. You can contact the Customer Relations Team by using the relevant contact in Suncorp's Privacy Contact Information table which can be found [here](#).

While we aim to deal fairly and promptly with your complaint, if you are still dissatisfied you can request a review by the Australian Financial Complaints Authority or refer your complaint to the Office of the Australian Information Commissioner as follows:

Office of the Australian Information Commissioner (OAIC)	Australian Financial Complaints Authority (AFCA)
Complaints must be made in writing	AFCA has authority to hear certain disputes. Contact AFCA to confirm if they can assist you.
<div><div></div><div>1300 363 992</div></div> <div><div></div><div>Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2000</div></div> <div><div></div><div>Via the OAIC general enquiry form: <a href="#">OAIC Web Form</a> Via the OAIC Privacy Complaint form: <a href="#">OAIC Web Form</a> <a href="https://www.oaic.gov.au">https://www.oaic.gov.au</a></div></div>	<div><div></div><div>1800 931 678</div></div> <div><div></div><div>Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001</div></div> <div><div></div><div><a href="mailto:info@afca.org.au">info@afca.org.au</a> <a href="https://www.afca.org.au/">https://www.afca.org.au/</a></div></div>

# Changes and getting a copy of the Policy

We encourage you to review and check our websites regularly for any updates to this Privacy Policy. We will publish the updated version on this website and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us.